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Art of Living Foundation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ART OF LIVING FOUNDATION, a
California corporation,

Plaintiff,

vs.

DOES 1-10, inclusive,
Defendants.

Case No. 10-cv-5022 LB

**DECLARATION OF KARL S.
KRONENBERGER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ADMINISTRATIVE RELIEF TO TAKE
EXPEDITED DISCOVERY**

1 I, Karl S. Kronenberger, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and the
3 United States District Court for the Northern District. I am partner at the law firm of
4 Kronenberger Burgoyne, LLP, counsel of record for Plaintiff Art of Living Foundation
5 ("Plaintiff" or "AoL"). Unless otherwise stated, I have personal knowledge of the matters
6 stated herein.

7 2. Plaintiff's complaint alleges several causes of action, including copyright
8 infringement, misappropriation of trade secrets, defamation and trade libel against
9 unknown Doe defendants ("Defendants"). Pursuant to Civil Local Rule 7-11, Defendants'
10 stipulation to the present administrative motion could not be obtained because their
11 identities and locations are presently unknown to Plaintiff.

12 3. I have assisted Plaintiff in making a good faith effort to identify Defendants
13 by reviewing their defamatory and infringing posts on the following blogs: Leaving the Art
14 of Living, located at <artoflivingfree.blogspot.com> (the "Blogspot Blog"), and Beyond the
15 Art of Living, located at <aolfree.wordpress.com> (the "WordPress Blog") (collectively,
16 "the Blogs"). Neither blog provides identifying information for the posters. Furthermore,
17 Defendants have taken efforts to conceal their true identities on these blogs by posting
18 under fictitious usernames and removing all identifying information. Indeed, as of the
19 date of this declaration, Defendants had posted on the WordPress Blog the following
20 description of themselves: "We are several people working together making this blog,
21 but we retain anonymity even amongst each other."

22 4. As alleged in Paragraph 59 of the Complaint, Defendants operate and
23 contribute to the Blogs under the following fictitious names: Skywalker, Aolwhistleblower,
24 Whistleblower, AoL-Free, Peaceful Warrior, Klim, Klim & Co., and Prosecutor.

25 5. As alleged in Paragraph 62 of the Complaint, by way of example,
26 Defendants have made the following defamatory statements about Plaintiff:

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- The truth is more disgruntled people should come out to do something about all the illegal activities that occur thru and in his organization, ranging from exploitation, to swindling, to cheating, to physical abuse, to sexual harassment and fondling, etc.
- Here is the man who waved off female devotees raped or beaten up by his devotees by telling them it was their fault or that they deserved it since “Violence attracts violence. Your karma.”
- And let us not forget that AOL course participants are told their fees go to charity, that AOL teachers work as volunteers, that SriSri [Ravi Shankar] and BhanuDidi are not the beneficiaries of the course fees!! In other words they obtained money from participants on false, deceitful declarations.
- Unfortunately, there are even stories of male teachers raping female students or teachers, and other forms of perversion. The inner circle knew about this.
- Many teachers, especially senior teachers take advantage of their status. Women fall for them like bees for honey, not knowing they are just being used for sex.
- The ‘dollar a day’ program was started in the US. The money never went to that cause.
- If you are yourself a rich business man and want to launder your black money or show your competitors that oh I have a Guru then AOL is for you.
- He [Ravi Shankar] will use you until he no longer sees you as useful. If you try to leave and he is afraid you known too much about him, he will threaten you, directly, from his own mouth, and through others. You would not be the first, and will not be the last to leave and come under threat, ridicule, and be subject to lies and sick rumors.

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- 1 • Many, still scarred by the AoL brain-wash are ashamed of seeking therapy.
2 The physical damages require all sorts of medical supervision that not even
3 doctors understand.
- 4 • There are many cases that companies, individuals give money to AOL
5 organisation for specific projects, but the money never reaches those
6 projects. It is then left to poor AOL teacher or volunteer to explain to the
7 company/donors WHY THE PROJECT IS NOT COMPLETED & SAY
8 WHERE THE MONEY WENT TO! These people are just shameless & have
9 huge appetite for \$\$\$! AOL volunteers & members, for God's sake wake up
10 & stop giving money to SriSri & his lackeys. None of this money goes
11 toward helping any poor or disadvantaged people. ALL ends up in SriSri &
12 family & Lackey's coffers.
- 13 • This leaves us with no doubt that SriSri has reached an acute stage of his
14 degenerative illness and is in urgent need of hospitalization before total
15 collapse!
- 16 • And so, some remain anonymous because of verbal and physical threats
17 made, and others because of psychic threats made, yes, even by the
18 precious master himself!
- 19 • And of course as one gets to know RS [Ravi Shankar] more & more one
20 becomes more & more aware what a violent man RS is. Doing violent acts
21 with total calm & smile on his face doesn't make those acts any less violent
22 nor it reduces the impact on the victims. It just shows his lack of
23 compassion & empathy & how calculated he is like a mafia boss. Behind
24 all smiley front of AOL, the organisation is actually rife with violence
25 (mental, emotional, spiritual). Many senior teachers are actually known as
26 bullies & are extremely violent & foul- mouthed. Many members & teachers
27 actually leave the organisation due to existing culture of abuse & violence
28 in the organisation.

- Again answer is obvious, the master is a charlatan (is a person practising quackery or some similar confidence trick in order to obtain money) in disguise.
- And so, some remain anonymous because of verbal and physical threats made, and others because of psychic threats made, yet, even by the precious master himself.
- The money raised for "service projects" get diverted to his personal kitty - all we see is token work.
- From then on, I started observing closely and after many years I am fully convinced that AOL is front-end name for a group of fraudulent NGOs. My lawyer tells me that what they are doing amounts to large-scale organized fraud according to the laws of several countries. The most important 'knowledge point' that AOL practices is Fake It Till You Make It. This cancer has been introduced into many activities by SSRS [Ravi Shankar] himself.
- He [Ravi Shankar] has so many enemies it could have been bc of a family or an individual he ruined, land he took, money he swindled, someone he abused.
- Money from courses does not go into "service projects" it goes into RS's [Ravi Shankar's] bank account. He uses it to start up other businesses—ostensibly making more money for himself. The mafia also operates this way—they fund legitimate businesses from their ill-gotten wealth.
- "Money from courses does not go into "service projects" it goes into RS's bank account. He uses it to start up other businesses—ostensibly making more money for himself. The mafia also operates this way—they fund legitimate businesses from their ill-gotten wealth." (Posted on the WordPress Blog on June 1, 2010 by username Peaceful Warrior.)

6. The only contact information on either of the Blogs for any Defendant is the email address reklawyksekul@gmail.com, which, on the date of this declaration,

1 appeared on the "ABOUT" tab on the WordPress Blog at the following web address:
2 <<http://aolfree.wordpress.com/about/>>.

3 7. On the WordPress Blog, additional information about particular users is
4 accessed by clicking on their profile pictures—namely, their <www.gravatar.com>
5 profiles. Accordingly, Defendants' WordPress usernames are linked to their Gravatar
6 profiles as follows:

- 7 a. username Peaceful Warrior is linked to Gravatar profile Mcauthon;
- 8 b. username Skywalker is linked to Gravatar profile Skyklm;
- 9 c. username Prosecutor is linked to Gravatar profile Artoflivingfeedback;
- 10 and
- 11 d. username Whistleblower is linked to Gravatar profile Aolwhistleblower.

12 8. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's draft
13 subpoena to Google, Inc.

14 9. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's draft
15 subpoena to Automattic, Inc.

16 I declare under penalty of perjury under the laws of the United States of America
17 that the foregoing is true and correct and that this Declaration was executed on
18 November 9, 2010, in San Francisco, California.

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20 s/ Karl S. Kronenberger

21 Karl S. Kronenberger
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